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REMARKS

Claims 1-30 of the application stand rejected. Claims 1, 2, 4, 6-12, 14-25 and 28-30 have been amended herein to more clearly define the scope of the presently claimed invention. Claims 3 and 13 have been canceled herein without prejudice to the filing of continuations and/or divisionals. Applicants respectfully request reconsideration of pending Claims 1, 2, 4-12 and 14-30 in light of the amendments and remarks herein.

Drawings objections

The Examiner objected to the drawings because lead lines or other appropriate designation to connect reference characters to the details to which they refer are missing in Figure 4. Applicants respectfully submit that a corrected Figure 4 is submitted herewith that overcomes the Examiner's objection. Applicants therefore respectfully request the Examiner to withdraw the objection to the drawings.

Claim objections

Claim 29 is objected to because the Examiner points out that it is missing a semicolon. Applicants respectfully submit that the claim is in fact missing a colon, which has been inserted in the amended claim herein. Applicants therefore respectfully request the Examiner to withdraw the objection to Claim 29.

35 U.S.C. §102

Claims 1-27 stand rejected under 35 U.S.C. § 102(b) as anticipated by Knowlton (PCT Published Application, International Publication Number: WO 92/16898). Additionally, Claims 28-30 stand rejected under 35 U.S.C. § 102(b) as anticipated by Bloomberg (U.S. Patent No. 5,765,176). Applicants respectfully traverse the rejections.

As a preliminary matter, Applicants respectfully submit that the rejections of Claims 1-30 are facially deficient because the Examiner has not established a *prima facie* case of unpatentability. As is well-established, in order to establish a *prima facie* case of unpatentability under 35 U.S.C. § 102, the prior art must disclose every limitation of the claims being rejected. Therefore, if even one claim element or

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limitation is not taught or suggested by reference, a *prima facie* case is not established. Additionally, as the Federal Circuit has noted,

"As adapted to ex parte procedure, Graham [v. John Deere Co.] is interpreted as continuing to place the 'burden of proof on the Patent Office which requires it to produce the factual basis for its rejection of an application under sections 102 and 103.'"

In re Piasecki, 745 F.2d 1468, 1472, 223 USPQ 785, 788 (Fed. Cir. 1984) (citing *In re Warner*, 379 F.2d 1011, 1016, 154 USPQ 173, 177 (CCPA 1967)). The Examiner thus has the burden of producing a factual basis for his rejection and for establishing anticipation by identifying how each recited claim element is allegedly disclosed by the cited reference(s). Applicants respectfully submit that the Examiner has failed to do so. For example, with respect to Claim 1, instead of pointing to specific elements in Knowlton to show how Knowlton discloses *each element* of Claim 1 herein, the Examiner appears to point to portions of Claim 1 of Knowlton and makes the leap that the claim in its entirety somehow discloses each element of Claim 1 of the invention. The Examiner makes absolutely no showing of which elements of the claimed invention each line of Knowlton's claim 1 is directed to. The rejection of the remaining claims suffer from a similar lack of support. Applicants therefore submit that the Examiner has failed to establish a *prima facie* case and has merely provided general bare allegations that the references anticipate the claims. Applicants therefore respectfully request the Examiner to provide more detailed information to allow Applicants to more completely respond to the Examiner's rejection. Barring that, Applicants respectfully submit that the Examiner has failed to meet the requisite burden of proof and as such, Applicants respectfully request the Examiner to withdraw the 35 U.S.C. § 102 rejections to pending Claims 1-30.

Even assuming arguendo the Examiner's assertions are deemed sufficient to establish a *prima facie* case, Applicants respectfully submit that Knowlton and/or Bloomberg do not anticipate Claims 1-27. First and foremost, Claims 3 and 13 have been canceled herein without prejudice to the filing of continuations and/or divisionals. As such, the rejection to these claims is moot. With respect to Claims 1, 2, 4-12 and 14-27, Applicants respectfully traverse the Examiner's rejection based on Knowlton and submit that Knowlton does not disclose each and every elements of the claimed

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invention. Specifically, independent Claims 1, 11, 19 and 25 each include at least the elements of enabling display of at least one page of a document on a viewing screen and enabling a user to selectively ungreek at least a portion of a greeked portion of the at least one page. Knowlton does not disclose such a scheme. Instead, as described in Knowlton “[a] system according to the present invention displays the context of a much larger portion of a document than can be legibly presented in the available display area. His is accomplished by presenting the document in a ‘greeked’ form, which is visually compressed to such a degree that the characters of the text are not legible, but larger shapes remain visible – i.e., overall shapes in the document, such as headings, blank lines, paragraphs, and indentations.” (Knowlton, Page 2).

Applicants respectfully submit that the scheme described in Knowlton is similar to typical greeking schemes described in the background section of the Specification. Specifically, as described in the Background:

“The general purpose of greeking a document is to enable a user to view the layout of a document without necessarily viewing the actual text of the document. In other words, greeking is typically used when the user does not have to and/or want to read the actual text, but is rather interested only in the way the document will look (e.g., graphic designers may use greeked text to lay out columns, including the number of words, paragraphs, paragraph breaks and various other information typically required to properly generate text and/or graphics that fit the design layout). The unreadable and/or nonsensical characters thus represent the actual text that will ultimately be displayed and/or printed in the document, including the exact dimensions of the characters.”

Specification, Page 2, Paragraph 9

Applicants are not attempting to claim the general concept of greeking herein. Instead, as claimed in the amended claims herein, embodiments of the invention enable a user to view a page of a document that is greeked in part (e.g., sensitive information) and to ungreek a selected portion of the greeked portion of the page. In other words, instead of viewing a “layout” such as that described in Knowlton, embodiments of the present invention present an actual view of a page of a document, greeked in part to protect the security of portions of the page. The user may then selectively ungreek the portion of the page that the user is interested in, to view the actual content of the greeked portion. Applicants respectfully submit that nothing in Knowlton discloses such a scheme and as such, Knowlton does not anticipate independent Claims 1, 11 19 and 25 (and all claims dependent on these independent Claims).

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With respect to Claims 28-30, Applicants again traverse the Examiner's rejection. Applicants respectfully point out that Claims 28-30 have been amended herein to more clearly define the scope of the claimed invention. Applicants respectfully submit that the Examiner's rejection to these claims based on Bloomberg is hereby moot in light of the amendments and respectfully requests the Examiner to withdraw the rejection.

In summary, Applicants respectfully submit that Claims 1, 2, 4-12 and 14-30 are not anticipated by either Knowlton and/or Bloomberg. Applicants therefore respectfully request the Examiner to withdraw the 35 U.S.C. § 102(b) rejections to these claims.

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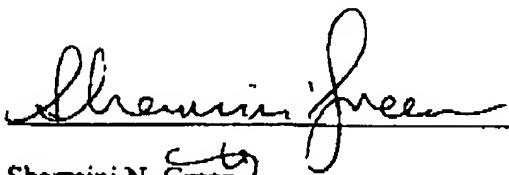
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CONCLUSION

Based on the foregoing, Applicants respectfully submit that the applicable objections and rejections have been overcome and that pending Claims 1, 2, 4-12 and 14-30 are in condition for allowance. Applicants therefore respectfully request an early issuance of a Notice of Allowance in this case. If the Examiner has any remaining questions, he is encouraged to contact the undersigned at (714) 669-1261.

Respectfully submitted,

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